

CORRESPONDENCE CONTROL
ROOMING LTR NO.

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Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

93-DOE-13399

NOV 29 1993

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ROCKY FLATS PLANT
CONFIDENTIAL - EMISSIONS CONTROL

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Baughman:

This letter responds to the consequences of your August 30, 1993 letter, regarding the proposed Comprehensive Risk Assessment (CRA) at the Rocky Flats Plant (RFP), which was addressed to the U.S. Department of Energy, Rocky Flats Office (DOE/RFO) and the U.S. Environmental Protection Agency, Region VIII (EPA).

We were disappointed to receive your letter because it essentially stopped progress on the CRA.

On the positive side, DOE/RFO, EPA and the Colorado Department of Health (CDH) agree that the Ecological Risk Assessment (ERA) portion of the CRA is essential. However, CDH must realize that work cannot proceed on the ERA until the CRA is scoped in its entirety.

A failure to promptly begin work on the CRA for the RFP site will jeopardize our joint efforts to produce an initial CRA document that must be integrated with the Feasibility Study/Corrective Measures Study (FS/CMS) for Operable Units (OUs) 1 and 2 currently scheduled in the Rocky Flats Interagency Agreement (IAG) for completion in 1994. Furthermore, any delay may adversely impact the necessary integration of the FS/CMS for OUs 3, 5, and 6, currently scheduled in the IAG for completion in 1995. The prompt integration of the CRA is especially critical at OUs 3, 5, and 6, because these OUs potentially receive environmental contaminants from all other OUs within the boundary of the RFP.

The initial CRA activity is development of a database management system upon which all other CRA activities depend. Note that the data management system is critical to the ERA. This activity is also a critical path item for adequately completing the CRA process in a rigorous and defensible manner. This task initially is extremely time intensive. However, until the CRA is scoped in its entirety and accepted by CDH, EPA and DOE/RFO, DOE/RFO cannot fund individual CRA tasks. We implore CDH to consider that the time lost due to the current delay in initiating the CRA likely will not be regained.

The EPA and DOE/RFO are extremely concerned that if the CRA is not integrated into the hazardous substance response/corrective action process at RFP in a timely manner, fully informed risk-based remedial and corrective action decisions may not be made.

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BENEDETTI, R.L.		
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRANZ, W.A.		
HANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.		
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KIRBY, W.A.		
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McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SULLIVAN, M.T.		
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Bushy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Roberts	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Harrington	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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PATS/T130G		
ADMIN RECORD/080	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Reviewed for Addressee
Corres. Control RFP

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DATE BY

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NOV 29 1993

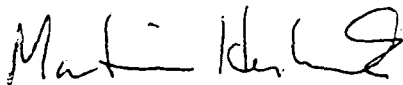
G. Baughman
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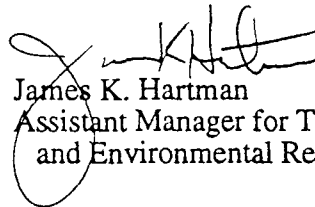
Therefore, we ask for your support in reactivating the CRA Forum to resume completion of the Human Health Risk Assessment (HHRA) template that had been initiated in the latter scoping meetings conducted during the May 11-June 3, 1993 time period. We further ask for your support in completing the Ecological Risk Assessment (ERA) template. The HHRA and the ERA have complementary and overlapping fate and transport elements.

Lastly, please find enclosed responses to the concerns expressed in your letter. Please review our responses to these items and respond in writing to EPA and DOE/RFO by December 23, 1993, as to whether or not your concerns are adequately addressed and whether CDH agrees with the revised scope of the CRA. DOE/RFO may then proceed to address FY 94 CRA funding. Further delays to the CRA may result in the inability to produce and integrate the CRA within IAG time frames for the FS/CMS at OUs 1, 2, 3, 5, and 6. If DOE/RFO, EPA, and CDH are to select remedies protective of human health and the environment that are both fiscally and scientifically defensible, the CRA must immediately proceed.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project
U.S. Environmental Protection Agency,
Region VIII



James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Enclosure:

cc w/Enclosure:
R. Schassburger, ERD, RFO
B. Thatcher, ERD, RFO
A. Howard, EPD, RFO
N. Hutchins, EG&G
W. Busby, EG&G
R. Roberts, EG&G
F. Harrington, EG&G
B. Ramsey, SMS
B. Lavelle, EPA
M. Hestmark, EPA
J. Schieffelin, CDH
J. Love, CDH
R. Stewart, DOI
R. Cattany, CDNR

RESPONSES TO CDH CONCERNS EXPRESSED IN AUGUST 30, 1993 LETTER

Concern 1 - Use of historical and current plant operations information to estimate worker exposure.

Response: We propose to utilize historical and plant operations information only to the extent that air dispersion modeling results are benchmarked. We will answer the question "what are the exposure calculations for air relative to actual measured data?" and discuss the differences in the uncertainty analysis. This will require an evaluation of the useability of the historical and current plant operations data which will be explicitly stated in the CRA. However, data agreed to be not useable by RFO, EPA and CDH will not be used.

The DOE has a responsibility to consider risks at the RFP that currently fall outside of the IAG (i.e., building emissions). However, these additional sources of risk will not be considered in the CRA.

Concern 2 - Finalize OU-specific risk assessment methodology prior to structuring the CRA. CRA HHRA must be composed of the individual OU HHRA's.

Response: Since the CRA will be a living document incorporating the results of OU-specific RFI/RI Reports which include Baseline Risk Assessments, and since the CRA will identify data gaps and redundancies in OU-specific RFI/RI's, the CRA and OU-specific risk assessments are linked by feedback loops. Since the spatial scale at which the CRA is to be performed is much larger than a single OU, it will not be appropriate to merely roll-up the OU-specific risk assessments into a CRA. We propose to define the methodology for the OU-specific risk assessments concurrently with the CRA.

During the scoping meetings, there was consensus that the CRA was fundamentally different from the OU-specific risk assessments since it considers all source terms and routes of exposure. We do not believe that it is viable to simply add up the human health risks calculated in the OU-specific risk assessments to get sitewide risk.

OU-specific risk assessments are limited to contaminants within the OU. There is no agreement among project managers as to the methodology to be followed in the OUs and no forum outside the CRA Forum which has dealt with the consistency issues. Therefore, we consider the CRA to be the essential framework for answering consistency and defensibility of the OU-specific risk assessments.

Concern 3 - The CRA usage by the SWEIS and IPP.

The U.S. Department of Energy (DOE) cannot properly and safely manage the RFP without considering all actual and potential sources of risk to human health and the environment. In fact, DOE is required by statute, regulations and DOE Orders to consider risk to workers, the public and the environment beyond the extent specified in the IAG. If the CRA is not performed under the IAG, it must be performed in concert with the SWEIS and the IPP. CDH would have much less influence on the CRA than under the IAG.

There is also a redundancy issue. It would be irresponsible for efforts similar to the CRA to proceed independently under the SWEIS and IPP. We believe that the IAG is the appropriate location to deal with the risk posed by contaminants in the environment under CERCLA, RCRA and CHWA. In this way, CRA results can be incorporated into the SWEIS and IPP without having to worry about the consistency and comparability of the risk assessments. Note, however, that coordination with the SWEIS and IPP risk assessment teams will be required.

Concern 4 - Do not concur on the initial year future use buffer zone exposure scenario.

Response: We propose to include a future residential scenario in the RFP buffer zone in the initial year CRA.

Concern 5- Work scope associated with data management, data interpretation, source characterization, release mechanism interpretation, and fate/transport estimation is potentially unnecessary. Only off-site human receptors need assessment on a sitewide basis.

Response: The ERA, which DOE/RFO, EPA and CDH agree is necessary, must be built on source term, release, transport and fate processes.

Also, since the spatial scale of the CRA is significantly different than that for OU-specific risk assessments, preparing the CRA will not be a simple matter of taking the OU-specific risk assessments and rolling them up in a CRA. This is particularly true for the COC selection process. As a result, all of the listed work scope will need to be revisited for the CRA when incorporating the results of OU RFI/RI Reports. We disagree that off-site receptors are the only receptors of interest for the CRA. Given the current uncertainty of future land use at the RFP, we believe it would be a major mistake to ignore potential on-site receptors. We propose to address data interpretation, source characterization, release mechanism interpretation, and fate/transport estimation for both the CRA and OU-specific risk assessments during the HHRA and ERA template preparation.

With regard to data management, please see paragraph four of the cover letter. Note that this element is of such critical importance to the CRA that it was addressed at this location.